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Coded 12/12/77
November 23, 1977 mlh

NESHAPS INVESTIGATION

GAF Corporation
Building Products Division
9215 Riverview Drive
St. Louis, Missouri

FILE: Mo. Air

An inspection tour was made of the GAF Corporation, Building Products Division, at 9 a.m., November 2, 1977, by Richard Knapp of the City of St. Louis, Division of Air Pollution Control, Department of Public Safety, with William H. Longston and Randy Ireland, Surveillance and Analysis Division, Environmental Protection Agency. The plant tour was conducted by Mr. John M. Goodling, Personnel Manager.

Process Description

The GAF Corporation produces mineral fiber products for siding, baffles in cooling towers, and other similar uses. Asbestos usage is estimated at 7,225 tons annually.

Although each product varies in composition, a typical batch composition would be the same as follows:

1,500 pounds cement
300 pounds recycled scrap
400 pounds limestone
300 pounds asbestos

These dry ingredients are dumped into the top of a mixer with water and mixed to form a slurry. A thin felt-like layer of this mixture is obtained by flooding the slurry onto one of two machines which are similar to rotary vacuum filters. The layers produced are formed into either flat (Machine No. 7) or corrugated (Machine No. 1) sheets. The sheets are then air dried, trimmed to standard size, and packaged for shipment.

Control Devices

All controlled emissions exhaust through one baghouse. This unit is a Wheelabrator No. 30-R, Model No. 112-CK, five-compartment baghouse, with each compartment containing 44 (5 x 12 inch) tube bags.

Exhausts feeding into this system include two mixing lines, conveyors, and a scrap material pulverizer. At the time of this inspection, only one line was in operation, and the scrap pulverizer was being overhauled.

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There are four cutting units which handle asbestos-cement products. Three dry saws exhaust into two small baghouses which, in turn, vent back into the work area.

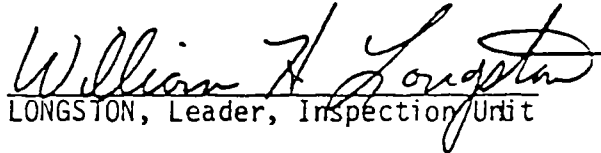
Discussion of Compliance Status

Asbestos dumping was observed both at the mixer hopper and at the baghouse exhaust. Since the asbestos is pre-moistened to suppress dust, none was observed at the mixer, and no visible emissions could be seen at the baghouse outlet.

On the basis of the equipment running at the time of the inspection, the facility was determined to be in compliance; but, the main contributor to asbestos emissions, the scrap pulverizer, was not working at the time of the inspection. Therefore, no compliance determination will be made until another inspection can be made.

Recommendations

It is recommended that no action be taken concerning this facility until a reinspection with all equipment operating can be scheduled.


LONGSTON, Leader, Inspection Unit

August 16, 1979

Mr. Earl Holtgraewe, P.E., Reg. Adm.
St. Louis Regional Office
Department of Natural Resources
8460 Watson Rd.
St. Louis, MO 63119

RE: Certainteed & GAF Asbestos Waste Piles Closure

Dear Mr. Holtgraewe:

This is to follow up on our phone conversation of August 15 and to give you our impressions of the plan for final closure of the subject waste disposal area as submitted to this office and reportedly your office by Reitz and Jens, Inc. It was understood that your office will be responsible for giving final approval of the plan if it meets with your satisfaction and, in conjunction, we are to provide you with any comments we might have.

We are in agreement with the closure plan as presented by Reitz & Jens, Inc. and suggest that upon completion of the closure operation the site receive surveillance to insure that the cover soil and riprap are properly in place and that a good perennial vegetative cover is established over the area. The main concern is to insure that both water and wind erosion are minimized. Upon completion of the project, it is suggested the area be inspected until a permanent vegetative cover is established and the integrity of all erosion control measures is insured.

If your review of the proposal for closure is favorable, please send us a copy of the approval letter. We understand that the contractor expects to start work on the project August 27, 1979. When the contractor has finished work, a closure plat should be filed with the appropriate Recorder(s) of Deeds as indicated by the consultant.

If you have any questions concerning our comments, please call.

Sincerely,

Thomas B. Ellis

Thomas B. Ellis
Environmental Engineer
Solid Waste Management Program

TBE:d1

cc: Mr. David E. Murray, Reitz & Jens, Inc.

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REITZ & JENS, INC.

CONSULTING ENGINEERS

HENRY M. REITZ, PRESIDENT
STIFEL W. JENS, SENIOR VICE PRESIDENT
JOHN J. BAILEY, JR., VICE PRES., CHIEF ENG.
DAVID E. MURRAY, VICE PRESIDENT
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111 SOUTH MERAMEC AVENUE
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SOIL MECHANICS-FOUNDATIONS
HYDROLOGY-HYDRAULICS
RESOURCE RECLAMATION
DRAINAGE-PAVEMENTS
LAND DEVELOPMENT
WATER RESOURCES
SOLID WASTE

August 10, 1979

Mr. Robert M. Robinson, Director
Solid Waste Management Program
Mo. DNR
Box 1368
Jefferson City, MO 65102

Re: Request for Final Closure
GAF-Certainteed Waste Piles

Dear Mr. Robinson:

This is a followup of our discussion of August 1, 1979 concerning proposed final closure plans for the asbestos waste disposal on the GAF Corporation property at 9215 Riverview Dr., St. Louis, Mo. and the Certainteed Corporation property at 600 St. Cyr Rd., St. Louis, Mo.

Construction bids have been received by both companies but contracts have not yet been awarded. Plans were filed yesterday with St. Louis Metropolitan Sewer District to obtain permit approval for surface water discharge into Maline Creek.

It is expected that contracts will be awarded and the contractor should be able to start work by August 27, 1979.

Proposed grading plan shows suggested final grades for the two waste piles. The contractor has the flexibility to adjust the slope within the range of 3H:1V maximum slope around the perimeter of the pile and to a minimum of 2% slope over the top surface of the pile. After the material is reworked, the asbestos waste will be covered with a minimum of 12 inches of dirt overburden removed from the Portland Cement Co. shale pit nearby. After the 12 inches cover is applied, the surface will be seeded. The plans also show a rock blanket placed on all slopes disturbed on the creek (MSD jurisdiction).

Attached, for your review and file, are two copies each of: 1) proposed Grading Plan; 2) seeding specification; 3) copy of Missouri-Portland Cement Co. letter authorizing removal of overburden; 4) draft of documents showing waste pile location to be filed with Recorder of Deeds when final closure is made.

If you have any questions, please advise.

Very truly yours,


DAVID E. MURRAY

Encl.
DEM/rs
cc: GAF Corp.
Certainteed Corp.

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REITZ & JENS, INC.

CONSULTING ENGINEERS

111 SOUTH MERAMEC AVENUE

St. Louis, Missouri 63105

(314) 727-0403

HENRY M. REITZ, PRESIDENT
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SOIL MECHANICS-FOUNDATIONS
HYDROLOGY-HYDRAULICS
RESOURCE RECLAMATION
DRAINAGE-PAVEMENTS
LAND DEVELOPMENT
WATER RESOURCES
SOLID WASTE

May 5, 1980

Mr. Earl Holtgraewe, Regional Administrator
St. Louis Regional Office
Mo. DNR
8460 Watson Rd.
St. Louis, MO 63119

Re: CertainTeed Waste Pile Closure

Dear Mr. Holtgraewe:

The asbestos cement waste pile closure has been completed at the CertainTeed Corp. plant site in accordance with the closure plans submitted to the Mo. DNR last August.

Two recent site visits were made in April to verify that a permanent vegetative growth was well established. The fence along the property line between CertainTeed Corp. and GAF Corp. has not yet been installed.

Enclosed for your review is a copy of the Closure Plat showing location of the secured waste pile. This Closure Plat will be filed with the Recorder of Deeds' office.

We request your final inspection and approval of this project. If there are any questions, please call.

Very truly yours,


DAVID E. MURRAY

Encl.

DEM/rs

cc: CertainTeed Corp. ✓

RECEIVED MAY 9 1980

perimeter slopes to no steeper than 3H:1V (see plans for suggested slope details). Move excess material from this grading onto waste pile. Reshape top of pile to drain. Slopes on top of pile shall be no flatter than 2%. Round tops of perimeter slopes to blend with top of pile (see plan for details). Grade drainage swales on sides of reshaped pile (see plan for details).

- (4) Construct drainage structure for discharge into Maline Creek (see plan for details). This will be staked out by the engineer for the owner.
- (5) Load and truck in clean earth cover and spread over entire surface of waste pile and regraded yard area. Cover material may be excavated by the contractor at the Missouri Portland Cement Company shale pit north of the site at no cost for borrow.
Earth cover on perimeter slopes, top of reshaped pile and drainage swales shall not be less than 12 inches thick. Earth cover on regraded yard area shall not be less than 12 inches thick.
- (6) Prepare surface for seeding.
- (7) Seed, fertilize, mulch top of pile, perimeter slopes and drainage swales.

Reitz & Jens, Inc. will act as representatives for CertainTeed and will provide the contractor with detailed specifications and drawings required to complete the work.

B. Permits

The contractor shall supply all necessary construction permits and licenses which may be required by local governmental authorities.

C. Safety & Health

- (1) It shall be the contractor's responsibility to properly inform his employees of the hazards associated with working with asbestos and to take all other necessary safety precautions as directed by current OSHA regulations.

All handling and disposal of asbestos-cement waste will be in accordance with current EPA regulations and in accordance with the conditions of the State Permit issued by the Missouri Department of Natural Resources for disposal in the state. If the contractor has any doubt as to what is required to properly indoctrinate his employees on the subject of working with asbestos, he should contact CertainTeed for assistance.

- (2) The contractor shall provide his employees with throw-away protective clothing and approved dust masks on a daily basis. CertainTeed will reimburse the contractor for the direct cost associated with this special protective equipment.
- (3) CertainTeed Corporation will contract with an independent company to conduct an industrial hygiene air monitoring program throughout the length of this project. The results of the dust sampling will be made available to the contractor.

D. Payment

All the work necessary to complete the project shall be performed for the lump sum fixed price of \$399,770.00.

Progress payment will be made monthly provided the contractor submits his invoice, properly substantiated, to Reitz & Jens, Inc. for their

review and approval. They, in turn, will forward the approved invoice to CertainTeed Corporation, P. O. Box 860, Valley Forge, PA 19482, attention of J. P. McGinley.

Within 10 days after receiving an approved invoice, CertainTeed shall pay the contractor ninety percent (90%) of the value of the completed work. When one half (1/2) of the total project is completed, CertainTeed shall pay the contractor ninety-five percent (95%) of the value of the completed work.

The total of all payments required prior to the final progress payment shall not exceed ninety-five percent (95%) of the total contract amount.

The contractor shall develop and submit to CertainTeed a project schedule showing major milestone events so that comparisons can be made when approving progress payments.

When the project is complete, the contractor shall furnish CertainTeed with a complete release from all liens arising out of this contract or receipts in full covering all labor, materials, and equipment for which a lien could be filed, or a bond satisfactory to the owner indemnifying him against any lien. The final invoice from the contractor shall state that the project work has been completed in full and conforms with the project specifications and drawings supplied by Reitz & Jens, Inc. CertainTeed will pay the contractor the balance of the monies owed thirty (30) days after receiving the final requisition provided that the contractor complies with the conditions stated above.

E. Insurance

During the course of construction and until the work is finally accepted by CertainTeed, or until sooner authorized by CertainTeed in writing, contractor shall maintain the following kinds of insurance with minimum limits as set forth below:

| Kind of Insurance | Minimum Limits |
|--|---|
| (a) Worker's Compensation | Statutory |
| (b) Employer's Liability | \$100,000 each accident-disease |
| (c) Contractor's Comprehensive General Liability (including Contractural Liability and, if subcontractors are employed, Contractor's Protective Liability) | Bodily Injury: \$250,000 each person \$500,000 each occurrence Property Damage: \$500,000 each occurrence |
| (d) Automobile Bodily Injury Liability (including hired automobiles and non ownership liability) | \$250,000 each person \$500,000 each accident |
| (e) Automobile Property Damage Liability (including hired automobiles and non ownership liability) | \$100,000 each accident |

Contractor agrees that it and all of its subcontractors will comply with all applicable Worker's Compensation laws and that it will from time to time on the request of CertainTeed furnish evidence to CertainTeed that all payments required by such laws have been and are being made.

J. P. McGinley

October 10, 1979



EXHIBIT
#7

GEORGIN FEED
←
← REMEDIAL WORK

REITZ & JENS, INC.

CONSULTING ENGINEERS

311 SOUTH MERAMEC AVENUE

St. Louis, Missouri 63105

11-5-79